

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

-against-

LINDA A. ALLEN as Trustee for GOLDEN ASSETS  
SETTLEMENT TRUST and Individually; BERRIEN  
COUNTY, MI; and ST. JOSEPH CHARTER TOWNSHIP,  
BERRIEN COUNTY, MI,

Defendants.

**NOTICE OF MOTION**

Case No. 1:25-cv-00118  
(PLM)(PJG)

Hon. Paul L. Maloney

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**PLEASE TAKE NOTICE** that upon all the pleadings and proceedings heretofore had herein, and Defendant Berrien County's Memorandum of Law in Support of Its Motion to Dismiss, dated March 18, 2025, Berrien County moves this Court before the Honorable Paul L. Maloney, United States District Judge, Western District of Michigan, at the Courthouse thereof, 699 Federal Building, Grand Rapids, MI, for an order dismissing the action as against Berrien County pursuant to Fed. R. Civ. P. 12(b)(6) on the grounds that the Complaint filed by the United States of America fails to state a claim against Berrien County upon which relief can be granted.

Dated: St. Joseph, Michigan  
March 18, 2025

/s/ Thaddeus J. Hackworth  
Thaddeus J. Hackworth (P84996)  
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